



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 14 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7677 8558
RETURN RECEIPT REQUESTED

Mr. Mark Knaus
Branch General Manager
Safety-Kleen Systems, Inc.
9261 Isanti Street Northeast
Blaine, Minnesota 55449

Re: Notice of Violation
Compliance Evaluation Inspection
MND981953045

Dear Mr. Knaus:

On August 19, 2014 a representative of the U.S. Environmental Protection Agency inspected the Safety-Kleen Systems, Inc. facility located in Blaine Minnesota (Safety-Kleen). As a large quantity generator of hazardous waste, hazardous waste storage facility, and used oil storage facility, Safety-Kleen is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Safety-Kleen's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste and used oil. A copy of the inspection report is enclosed for your reference.

Based on information provided by Safety Kleen, EPA's review of records pertaining to Safety-Kleen, and the inspector's observations, EPA has determined that Safety-Kleen violated a RCRA requirement related to the storage of used oil as described in paragraph 1, below.

1. Used Oil Storage Requirement

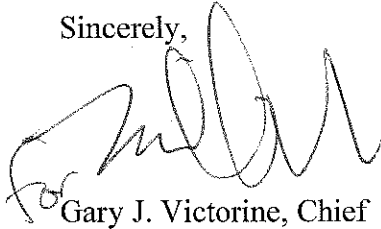
Under Minnesota Rules Chapter 7045.0855, Subpart 2, Item C [40 C.F.R. § 279.22(c)(1)], aboveground tanks used to store used oil must be labeled or marked clearly with the words "Used Oil." At the time of the inspection, one aboveground tank used for storage of used oil, located in an outdoor tank farm, was not labeled with the words, "Used Oil."

After the inspection, as documented in a September 19, 2014 email to EPA, you took certain actions to establish compliance with the above used oil storage requirement. Based on the

information received from Safety-Kleen on September 19, 2014, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates Safety-Kleen's cooperation.

If you have any questions regarding this letter, please contact Todd Brown, of my staff, at (312) 886-6091 or at brown.todd@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Victorine", written over the word "Sincerely,".

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Laura Schmidt, Anoka County Environmental Health Services
(Laura.Schmidt@co.anoka.mn.us)

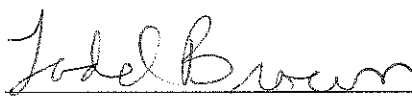
John Elling, Minnesota Pollution Control Agency (John.Elling@state.mn.us)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

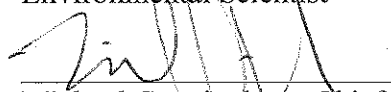
INSTALLATION NAME: Safety Kleen Systems, Inc.
U.S. EPA ID No.: MND981953045
LOCATION ADDRESS: 9261 Isanti Street Northeast
Blaine, Minnesota
NAICS CODE: 562112 – Hazardous Waste Collection
DATE(s) OF INSPECTION: August 19, 2014
U.S. EPA INSPECTOR: Todd C. Brown

PREPARED BY:


Todd C. Brown
Environmental Scientist

9/29/14
Date

REVIEWED BY:


Michael Cunningham, Chief
Compliance Section 1
RCRA Branch

9/29/14
Date

I. Purpose of Inspection

The purpose of this unannounced compliance evaluation inspection was to evaluate the compliance of Safety Kleen Systems, Inc. (Safety Kleen) with the Resource Conservation and Recovery Act (RCRA), with respect to its management of hazardous waste, universal waste and used oil.

II. Site Description

Safety Kleen's facility in Blaine, Minnesota is a permitted hazardous waste storage facility, hazardous waste transfer facility, and large quantity generator of hazardous waste. Its current RCRA storage permit was issued on June 9, 2011.¹ Facility structures include a warehouse and two out-door tank farms (Figure 1). There are approximately 17 employees at the location.



Figure 1: Aerial view of Safety Kleen Systems, Inc., 9261 Isanti Street Northeast, Blaine, Minnesota. The Return and Fill Area and Container Storage Area are located in the warehouse.

The facility serves as a “return and fill” station for spent parts washer solvent (petroleum naphtha). Containers of spent solvent possessing the characteristics of ignitability and toxicity (various constituents) are transported from customer locations to the facility, and emptied into one of two drum washer units located in the warehouse. The units clean the empty containers by recirculating the spent solvent. The spent solvent is piped to a permitted 15,000 gallon hazardous

1. The combined RCRA permit for the facility consist of both state and federally issued portions.

waste storage tank to await recycling at an off-site facility. Clean containers are filled with fresh solvent and returned to customers.

The hazardous waste tank system is located in an outdoor tank farm, which houses an additional five 20,000 gallon storage tanks for fresh parts washer solvent (two tanks), used oil/oily water (two tanks), and product methanol. The used oil/oily water is generated by off-site sources, and is held temporarily at the facility prior to off-site shipment. An adjacent tank farm is present for fire suppression water (8,000 gallons), product windshield wiper fluid (10,000 gallons), product propylene glycol (8,000 gallons) and product anti-freeze (8,000 gallons).

Safety Kleen is permitted to operate a Container Storage Area (CSA) for up to 6,912 gallons of hazardous waste. The CSA is located in the warehouse, and is used for storage of hazardous waste from both on- and off-site sources. Wastes permitted for storage include: sediment removed from the drum washers (dumpster sediment), spent immersion cleaner (another form of parts washer fluid), dry cleaning waste (filter cartridges and still bottoms), paint waste, photographic imaging waste (film negatives and cartridges of silver-bearing solution), aqueous brake cleaner, and other industrial fluids. These wastes are stored at the CSA prior to off-site shipment (brake cleaner may also be managed in the hazardous waste tank system).

As a transporter of hazardous waste, Safety Kleen uses the facility as a “10-day” transfer station for in-transit, containerized hazardous waste. The current transfer facility license was issued by Anoka County on July 2, 2014.

Hazardous wastes generated at the facility in 2013 included: spent solvent from commingling hazardous and non-hazardous waste (53,053 lbs), contaminated debris (27,337 lbs), petroleum naphtha tank bottoms (10,240 lbs), used oil retain samples (2,467 lbs), and petroleum naphtha sludge from cleaning of process equipment (2,397 lbs).²

III. Opening Conference

I arrived at Safety Kleen on August 19, 2014, along with Laura Schmidt, Community Health and Environmental Services Department, Anoka County. I conducted an opening conference with Mr. Mark Knaus, Branch General Manager. During the conference, I described the purpose of the inspection, and interviewed Mr. Knaus on facility operations. I discussed the public availability of government records, and the need for Safety Kleen to identify any information collected during the inspection that is considered confidential business information.

IV. Site Tour

I toured the facility with Mr. Knaus and Ms. Schmidt. The tour included, but was not limited to, the hazardous waste tank system, a walk of the security fence along the perimeter of the property, and the warehouse.

2. Source: 2013 Biennial Report.

Rainwater was present in the sump of the hazardous waste tank system's secondary containment. A hose extended from the sump, over the side wall of the concrete liner, and onto the adjacent grass field (photographs 1 – 3). Mr. Knaus explained that Safety Kleen had recently pumped rain water out of the secondary containment and onto the field.

The level gauge for the tank labeled, "Oily Water", registered 10 feet 7 inches. According to Mr. Knaus, the tank actually contained used oil. The tank was not labeled as used oil.

I asked Mr. Knaus to identify the leak detection device for the secondary containment system. In response, Mr. Knaus explained that leak detection was accomplished through visual inspection, and that automatic devices were not in place.

One 55-gallon container of "non-hazardous" absorbent material contaminated with oil was located in a bin, just outside of the hazardous waste tank farm (photograph 4).

The fence surrounding the facility appeared to be in good repair.

A frac tank for used oil storage was located to the east of the warehouse (photograph 6). The unit was labeled, "Used Oil."

Numerous containers of hazardous waste were present at the Return and Fill Area; the portion of the warehouse where the drum washers are located (photograph 7). At the time of the inspection, a single operator was actively emptying containers into one of the drum washers.

Numerous containers of hazardous and non-hazardous waste were present at the CSA (photographs 8-11). These included waste undergoing "10 day" transfer, waste generated at the facility, and off-site waste accepted for permitted storage (i.e., not 10 day transfer wastes). All of the containers of hazardous waste appeared to be appropriately labeled and dated. Specific hazardous waste streams observed included paint waste, branch debris, and brake cleaner.

V. Records Review

The following records were reviewed while conducting this inspection: (1) facility inspection records; (2) a diagram noting the locations of equipment (pumps, valves, etc.) associated with the drum washers and hazardous waste tank system; (3) the facility contingency plan; (4) RCRA training records; (5) financial assurance records; (6) the facility closure plan; (7) a tracking log for "10 day" transfer wastes; (8) a tank integrity assessment; (9) manifests; (10) a customer certification on use of Safety Kleen parts washers; (11) waste analysis records; and (12) the current inventory for the hazardous waste tank system and CSA.

Facility Inspection Records

Inspection records for 2014 were reviewed. The documents record: (1) weekly inspections of safety/emergency equipment and security devices; (2) daily inspections of the hazardous waste

and used oil tank systems; (3) daily inspections of the Return and Fill Area; (4) daily inspections of the CSA; and (5) daily inspections of the warehouse in general.

The records indicate that daily tank system inspections include visual inspection of 27 pieces of equipment including valves, camlocs, pumps, couplings, strainers, flanges, and a manway associated with the hazardous waste tank system and drum washers. Each piece of equipment is listed and numbered on the inspection log. A diagram is available in Safety Kleen's Part B Permit Application (which was on-site) noting the locations of each piece of equipment. The permit application includes Safety Kleen's determination (knowledge-based) that the tank system is not in light liquid service.

Safety Kleen maintains records of annual visual inspections of two closure devices associated with the fixed roof on the hazardous waste tank: a 24" top manway and a conservation vent (Annual CC Visual Inspection Checklist). I asked Mr. Knaus if Safety Kleen had documentation that the closure devices had been initially monitored to confirm operation with no detectable emissions. Mr. Knaus could not answer definitively at the time of the inspection.

I obtained photo copies of daily/weekly inspection records for the period of August 11 – 17; and the Annual CC Visual Inspection Checklist for 2013.³

Contingency Plan

Safety Kleen's contingency plan was on-site. I did not note any deficiencies with this document.

RCRA Training Records

I reviewed records from 2012 through 2014 pertaining to an annual RCRA training update provided to facility employees. The training was last provided on May 8, 2014. Eighteen employees attended. A description of the training course was available.

RCRA Closure Plan/Financial Assurance Records

The current RCRA facility closure cost estimate is \$81,418. Safety Kleen maintains a Certificate of Insurance for that amount issued by Indiana Harbor Company, effective January 25, 2014. I obtained a photocopy of the certificate. Upon review, I found the wording of the certificate to be consistent with the wording given at Minnesota Rules part 7045.0524, subpart 5.

A certificate of hazardous waste liability assurance is available in Safety Kleen's Part B permit application.

3. This particular inspection record was not dated. However, the other annual records dated from the 2012 and prior. Based on that, and a phone conversation between Mr. Knaus and the contractor that performed the inspection, it was deduced that the undated record pertained to the 2013 annual inspection.

Transfer Facility Tracking Records

The records indicate Safety Kleen tracks the following information for in-transit, containerized wastes.

- Date received
- Manifest Tracking Number
- Number of containers on the manifest
- Classification (hazardous vs. non-hazardous)
- Date waste left facility

Tank Assessment

Safety Kleen maintains a record of a tank integrity assessment conducted on its hazardous waste tank system in 1988 by Graef, Anhalt and Schloemer, Associates, Inc.

Manifests

Hazardous waste manifest were on-site dating back at least three years. The 2014 records indicate that the spent parts washer waste is shipped to the Safety Kleen facility in Dolton, Illinois (ILD980613913).

Parts Washer Customer Education Records

Section III.R of the state-issued portion of Safety Kleen's RCRA permit requires Safety Kleen to provide information to its customers on using its parts washers in accordance with the Minnesota Hazardous Waste Rules. Safety Kleen is required to document that it provides this information to customers initially, and on an annual basis, by having its customers and Safety Kleen's sales representative sign a form acknowledging that the customer received and understood the information.

I requested an actual example of one of the parts washer education forms. In response, I was provided with a service invoice for a customer from August 8, 2014, which included a signed certification by a customer attesting, among other things, that the process generating the waste solvent has not changed, and that the customer will not introduce any substances into the parts washers, including without exclusion, hazardous waste, unless incidental to the normal use of the parts washer. The form is not signed by a Safety Kleen sales representative.

Annual Waste Re-characterization

I reviewed the results of the annual waste re-characterization analysis for wastes handled at the facility, as described in Safety Kleen's permit application, for the year 2013. The analysis concluded that certain waste codes should be added or removed for certain waste streams.

Waste Inventory

The daily inventory indicated that as of 6:30 A.M. on the date of the inspection, there were 4,536 gallons of waste in the hazardous waste tank system, and 4,860 gallons total of waste in the CSA.

VI. Closing Conference

Prior to my departure, I conducted a closing conference with Mr. Knaus. At that time, I identified the labeling on the oily water tank, and the lack of an automated leak detection device for the hazardous waste tank system, as potential compliance issues.

Attachments

A: Inspection Photographs

B: Minnesota Pollution Control Agency TSDF Compliance Evaluation Inspection Checklist

Attachment A: Photographs for Safety Kleen Systems, Inc. (MND981953045) - Blaine, Minnesota

Photo Number 1

Photo Filename DSCN0659.JPG

Date/Time 8/19/2014
9:57:04 AM

Photographer Todd Brown

Description

Sump for the secondary containment system housing the hazardous waste storage tank. A hose extended from the sump, over the side wall and onto the adjacent grass. The sump appeared to contain rain water.



Photo Number 2

Photo Filename DSCN0660.JPG

Date/Time 8/19/2014
9:57:18 AM

Photographer Todd Brown

Description

Hose extending from the sump of the hazardous waste storage tank's secondary containment system, over the side wall and onto the adjacent grass. The sump appeared to contain rain water.



Attachment A: Photographs for Safety Kleen Systems, Inc. (MND981953045) - Blaine, Minnesota

Photo Number 3
Photo Filename DSCN0661.JPG
Date/Time 8/19/2014
9:57:24 AM
Photographer Todd Brown

Description

End of the hose extending from the sump of the hazardous waste storage tank's secondary containment system.



Photo Number 4
Photo Filename DSCN0662.JPG
Date/Time 8/19/2014
10:03:20 AM
Photographer Todd Brown

Description

Container for accumulation of absorbent material contaminated with oil. The container was located in a bin outside of the secondary containment system for the hazardous waste storage tank.



Attachment A: Photographs for Safety Kleen Systems, Inc. (MND981953045) - Blaine, Minnesota

Photo Number 5

Photo Filename DSCN0663.JPG

Date/Time 8/19/2014
10:04:00 AM

Photographer Todd Brown

Description

Hazardous waste storage tank (left) and
used oil storage tank (right).



Photo Number 6

Photo Filename DSCN0664.JPG

Date/Time 8/19/2014
10:18:28 AM

Photographer Todd Brown

Description

Used oil fractionation tank located east of
the warehouse.



Attachment A: Photographs for Safety Kleen Systems, Inc. (MND981953045) - Blaine, Minnesota

Photo Number 7
Photo Filename DSCN0665.JPG
Date/Time 8/19/2014
10:28:58 AM
Photographer Todd Brown

Description

Containers awaiting processing in the drum washers. The two drum washer units can be seen as the gray structures located to the left and right of the exit door.



Photo Number 8
Photo Filename DSCN0666.JPG
Date/Time 8/19/2014
10:46:06 AM
Photographer Todd Brown

Description

Wastes awaiting off-site transfer in the Container Storage Area. All but one of the containers was labeled as a non-hazardous waste or used oil. One container was labeled as hazardous paint waste.



Attachment A: Photographs for Safety Kleen Systems, Inc. (MND981953045) - Blaine, Minnesota

Photo Number 9

Photo Filename DSCN0667.JPG

Date/Time 8/19/2014
10:47:06 AM

Photographer Todd Brown

Description

Containers of hazardous waste generated on-site, and non-hazardous waste received from off-site, located in the Container Storage Area. The hazardous waste consisted of "debris" removed from the drum washers (see photograph 10).



Photo Number 10

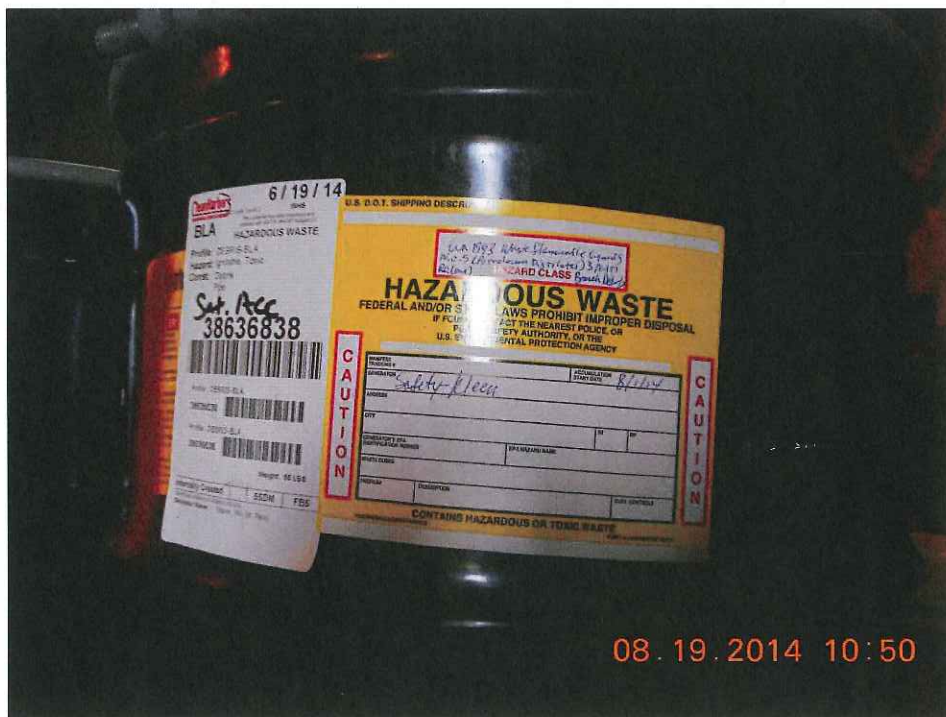
Photo Filename DSCN0668.JPG

Date/Time 8/19/2014
10:50:32 AM

Photographer Todd Brown

Description

Label on one of the containers featured in photograph 10.



Attachment A: Photographs for Safety Kleen Systems, Inc. (MND981953045) - Blaine, Minnesota

Photo Number 11

Photo Filename DSCN0669.JPG

Date/Time 8/19/2014
10:51:56 AM

Photographer Todd Brown

Description

Containers of hazardous waste received from off-site located in the Container Storage Area. The contents included waste paint and break cleaner.



Minnesota Pollution Control Agency

Report Title: Treatment, Storage, Disposal Facility (TSDF) Compliance Evaluation Inspection Checklist

EPA

Preferred ID: MND81953045 Regulated Party: Safety-Kleen Systems

Date: 8/19/14

Inspector: Todd Brown, U.S. EPA

FC: Licensing / EPA / Permits

Rule	Requirement	Compliance Status	Remarks
7045.1020 A	Metro Area - Does the Regulated Party have an approved license?	Yes	
7045.0225 1	Outstate - Does the site have a current hazardous waste generator license?	N.A.	

FC: Waste Analysis Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0458 2, A	Does the waste analysis plan contain parameters for analysis and rationale for selection of those parameters?	Yes	
7045.0458 2, B	Does the Waste Analysis Plan contain test methods to fit the selected parameters? (including TCLP if appropriate)	Yes	
7045.0458 2, C	Does the Waste Analysis Plan contain suitable methods of sampling?	N.I.	
7045.0458 2, D	Does the Waste Analysis Plan contain frequency of analysis / review information?	Yes	
7045.0458 2, E	For off-site Regulated Parties, is a waste analysis supplied by each Regulated Party?	N.A.	
7045.0458 2, F	Does the Waste Analysis Plan consider other criteria including 1) LDR Criteria, 2) Vent & equipment leak test methods and procedures (RCRA organic air emissions, Subpart AA & BB) NOTE: These items are by referral to other rules and should be cited from those rules with reference from this rule.	Yes	
7045.0458 2, G,1	Are there procedures to verify the identity the waste upon arrival at the facility from an off-site generator?	Yes	

FC: Waste Analysis Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0458 2, G, 2	Are there sampling methods to identify the waste upon arrival at the facility from an off-site generator(s), if needed?	No A.	Plan requires annual recharacterization of retain samples

FC: Operating Record

Rule	Requirement	Compliance Status	Remarks
7045.0478 2	Does the facility maintain a written operating record onsite?	Yes	
7045.0478 3, A	For facilities receiving hazardous waste from off-site, does the operating record contain the names and identification numbers of the generators?	Yes	
7045.0478 3, B	Does the operating record contain the date of arrival of each hazardous waste shipment and the transporter's name and identification number?	Yes	
7045.0478 3, C	Is there a description and quantity of each hazardous waste received and the method(s) and date(s) of each waste's treatment, storage or disposal?	Yes	
7045.0478 3, D	Does the operating record contain the location and quantity of each hazardous waste within the facility? For disposal facilities, is there a map or diagram of the disposal area showing the location and quantity of each hazardous waste? [This information should be cross referenced to specific manifest numbers.]	Yes	
7045.0478 3, E	Are there records and results of all waste analyses, trial tests, monitoring data, and operator inspections including process vent and equipment leak test methods, procedures, and record keeping requirements (Subpart AA & BB)?	Yes	
7045.0478 3, J	Are there closure and post-closure cost estimates?	Yes	

jm

FC: Operating Record

Rule	Requirement	Compliance Status	Remarks
7045.0478 3, L	Is the certification signed by owner/operator or authorized rep?	No I.	

FC: General Facility Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0452 3, A	If facility receives hazardous waste from outside the US, has the facility given written notice to MPCA and EPA Reg.5 regarding receipt of hazardous waste from a foreign source?	N.A.	
7045.0452 5, C	Is the inspection frequency for items in the inspection schedule based on possible deterioration rates of equipment? AND Are areas subject to spills inspected at least daily when in use?	Yes	

FC: Waste Evaluation

Rule	Requirement	Compliance Status	Remarks
7045.0458 2	Does the facility have a detailed waste analysis plan on site?	Yes	

FC: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0462 2	Are hazardous wastes managed to prevent releases?	Yes	
7045.0462 3, A	Does the facility have internal communications or alarm system capable of providing immediate emergency instruction?	Yes	
7045.0462 3, B	Is there an emergency telephone or device immediately available for summoning outside emergency responders?	Yes	

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FC: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0462 3, C	Does the facility have fire control, spill control, and decontamination equipment?	Yes	
7045.0462 3, D	Is water available in adequate volume for all fire control needs?	Yes	

FC: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7001.0520 1	Does the Regulated Party have a storage permit?	Yes	

FC: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0261 7	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)	Yes	
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?	No I.	
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?	Yes	
7045.0474 2, A	If the facility accepts hazardous waste from off-site: a. Does the facility sign and date each manifest?	Yes	

FC: Manifests			
Rule	Requirement	Compliance Status	Remarks
7045.0474 2, B	b. If applicable, are any discrepancies noted directly on the manifest?	Yes	
7045.0474 2, D	c. Send a manifest copy to the generator and MPCA within ten days after delivery?	No I.	
7045.0474 2, E	d. Retain manifest copies for at least three years from the date of delivery?	Yes	
7045.0476 3, C	f. If applicable, notify the MPCA immediately if hazardous waste is delivered that facility is not permitted to manage?	No I.	
FC: Land Disposal Restrictions			
Rule	Requirement	Compliance Status	Remarks
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the Regulated Party sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the Regulated Party's site? Have new notifications been sent when there are changes in waste streams and to any new receiving facilities?	Yes	
7045.1315 2	Does the treatment facility test its wastes in accordance to the frequency specified in their waste analysis plan?	No A.	Not a treatment facility.
7045.1315 2, A	For wastes with treatment standards expressed in concentrations in the waste extract, has the treatment facility tested treated waste residues or an extract of the residues and does the test method comply with federal requirements?	No A.	11
7045.1315 2, C	For wastes with treatment standards expressed in concentrations of the waste, has the treatment facility tested the treated waste residues (not an extract)?	No A.	11

JB

FC: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
7045.1315 2, F	For waste or treated residue that is further managed at a TSD facility, has the TSD sending the waste or treatment residues complied with generator notification and certification requirements?	Yes	

FC: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0454 2	Does the Regulated Party have a Training Program Director trained in hazardous waste management procedures?	Yes	
7045.0454 1	Have all Regulated Party personnel who manage hazardous waste completed a training program (within 6 months of hire or transfer) that teaches the correct performance of their duties both in normal times and in times of emergency?	No	
7045.0454 6, B	Do the records contain job descriptions?	Yes	
7045.0454 6, C	Do the records contain descriptions of training?	Yes	
7045.0454 4	Have new employees completed hazardous-waste-management training within 6 months of hiring or assignment to a new position?	No	
7045.0454 5	Have employees received annual review of hazardous-waste-management training at least once per calendar year?	Yes	
7045.0454 7	Are employee training records retained for the lifetime of the facility or for three years after an employee leaves?	Yes	

FC: Contingency Plan			
Rule	Requirement	Compliance Status	Remarks
7045.0466 2	Does the facility have a contingency plan?	YES	
7045.0466 5, B	Has a copy of the contingency plan been submitted to local police and fire departments, hospital or medical facility and other emergency response teams?	YES	per Contingency plan
7045.0466 4, A	Does the plan specify emergency response actions and procedures?	YES	
7045.0466 4, C	Has the facility made and documented emergency arrangements with local authorities (fire dept., police, local hospital, and other potential emergency responders)?	YES	documented in plan
7045.0466 4, D	Does the plan list emergency coordinator address and phones data? AND Do emergency coordinators have the authority to act (commit resources)?	YES	
7045.0466 4, E	Does the plan list emergency equipment and include its location and a physical description of each?	YES	
7045.0466 4, F	Is there an evacuation plan?	YES	
FC: Closure / Post-Closure			
Rule	Requirement	Compliance Status	Remarks
7045.0486 3	Does the facility have an approved closure plan?	YES	
7045.0486 3, A	Does the closure plan include: 1. A detailed description of how each hazardous waste unit will be closed, and how the facility will finally be closed?	YES	

JB

FC: Closure / Post-Closure

Rule	Requirement	Compliance Status	Remarks
7045.0486 3, B	2. An estimate of the maximum inventory of hazardous waste ever stored on-site during the active life of the facility and a detailed description of methods to be used during partial and final closure of the facility?	Yes	
7045.0486 3, C	3. A detailed description of steps needed to remove or decontaminate residual hazardous waste and equipment at the site?	Yes	
7045.0486 3, E	4. A schedule for closure of each hazardous waste unit and final closure of the facility?	Yes	
7045.0486 3, F	For facilities that use trust funds to establish financial assurance: Does the facility have an estimate of the expected year of closure?	N.A.	
7045.0486 4	Did the facility properly amend the closure plan, if required?	No	
7045.0502 1	Does the facility have a closure cost estimate?	Yes	
7045.0502 2	Do the cost estimates include adjustments for inflation?	Yes	
7045.0490 2	For Disposal Facilities and specified others, does the Regulated Party have an approved post-closure plan?	No	
7045.0490 3, A	Does the Postclosure Plan include a detailed description of the planned monitoring activities and frequencies at which they are performed after closure?	N.A.	
7045.0490 3, B	Does the Postclosure Plan include a description of the planned maintenance activities and the frequencies at which they will be performed after closure?	No	



FC: Closure / Post-Closure

Rule	Requirement	Compliance Status	Remarks
7045.0490 3, C	Did the facility properly amend the Postclosure Plan, if required?	No	
7045.0506 1	Does the facility have current cost estimates for postclosure monitoring and maintenance requirements?	No	
7045.0506 2	Do the cost estimates include yearly adjustments for inflation?	No	
7045.0508 1	Does the facility have financial assurance for postclosure care?	No	

FC: Corrective Action (at a TSD Facility)

Rule	Requirement	Compliance Status	Remarks
7045.0485 1	Is the Regulated Party undertaking corrective action as necessary for all releases to the environment, to protect human health and the environment?	No	
7045.0485 2	Does the Regulated Party's permit contain schedules of compliance for required corrective action?		
7045.0512 1	Does the Regulated Party have a written estimate of the cost to perform corrective action?		
7045.0512 2	Is there a yearly update of the cost estimate for corrective action?		
7045.0514 1	Is there assurance of financial responsibility for completing corrective action?		

JB

FC: Transporters

Rule	Requirement	Compliance Status	Remarks
7045.0302 4	If facility imports hazardous waste from a foreign country, are manifest requirements met? (Generator EPA ID not needed. Importer's address and signature can replace generator's.)	N.A.	

FC: Record Keeping Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0454 6, A	Do the records contain job titles?	Yes	